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Attorneys for Defendants

LG Electronics, Inc. and

LG Electronics U.S.A., Inc.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

BLUESTONE INNOVATIONS LLC,

Plaintiff,

v.

LG ELECTRONICS, INC. et al.,

Defendants.

Case No. 3: 13-cv-01770-SI

**STIPULATION AND ~~PROPOSED~~ ORDER  
UNDER LOCAL RULE 7-12 TO SERVE  
AMENDED PATENT L.R. 3-1  
INFRINGEMENT CONTENTIONS**

Judge: Honorable Susan Illston  
Courtroom: 10, 19th Floor

**STIPULATION UNDER LOCAL RULE 7-12 TO SERVE AMENDED PATENT L.R. 3-1  
INFRINGEMENT CONTENTIONS**

Case No. 3: 13-cv-01770-SI

1 IT IS HEREBY STIPULATED BY THE PARTIES, THROUGH THEIR  
2 UNDERSIGNED COUNSEL:

3 Pursuant to Civil L.R. 7-12 and Patent L.R. 3-6, Plaintiff Bluestone Innovations, LLC  
4 (“Bluestone”) and Defendants LG Electronics, Inc. and LG Electronics U.S.A., Inc. (collectively  
5 “LGE”), by and through their undersigned counsel, hereby consent and stipulate that, with leave of  
6 Court, Bluestone may serve amended Patent L.R. 3-1 infringement contentions upon LGE. In support of  
7 this stipulation, the parties state as follows:

8 The parties met and conferred about the sufficiency of Bluestone’s infringement claim charts with  
9 regards to the last element of claims 1 and 23. Even though Bluestone believes its claim charts  
10 sufficiently sets forth its infringement contentions with respect to the last element of claims 1 and 23, in  
11 an effort to avoid burdening the Court with a discovery dispute on this issue, Bluestone agrees to  
12 supplement its infringement claim charts.

13 By entering into this stipulation, LGE does not waive its right to challenge Bluestone’s use of  
14 representative claim charts. Indeed, LGE plans to submit a letter brief shortly after the parties enter into  
15 this stipulation asking this Court for relief from Bluestone’s use of representative claim charts. In  
16 addition, LGE wants to make clear that this stipulation relates to Bluestone’s procedural compliance with  
17 the Patent Local Rule 3-1 requirements. LGE does not waive any right or ground to challenge  
18 Bluestone’s contentions on substantive grounds, including that LGE’s accused products do not infringe  
19 the patent in suit.

20 For the avoidance of any confusion, LGE’s invalidity contentions shall be served by October 17,  
21 2013, as set forth in the parties’ Stipulated Request for Order Changing Time (Dkt. No. 125), regardless  
22 of the date by which this Stipulation and Proposed Order is entered and Bluestone serves its amended  
23 LPR 3-1 infringement contentions.

24 Accordingly, the parties stipulate that Bluestone may amend its Patent L.R. 3-1 infringement  
25 contentions within five days of this Stipulation and Proposed Order.  
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1 Dated: October10, 2013

NIRO, HALLER, & NIRO

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3 By: /s/ David J. Mahalek

DAVID J. MAHALEK

4 **DAVIS WRIGHT TREMAINE LLP**

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16 Attorneys for Plaintiff

BLUESTONE INNOVATIONS LLC

1 Dated: October 10, 2013

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2 By: /s/ Ashish Nagdev

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11 Attorneys for Defendants  
12 LG Electronics, Inc. and  
13 LG Electronics U.S.A.,  
14 Inc.

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16  
17 I, David J. Mahalek, am the ECF User whose identification and password are being used to file this  
18 Stipulation Under Local Rule 7-12. Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that counsel for the  
19 foregoing parties have concurred in this filing.

20 /s/ David J. Mahalek

DAVID J. MAHALEK

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.  
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3 Dated: 10/10/13  
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6 HONORABLE SUSAN ILLSTON  
UNITED STATES DISTRICT JUDGE  
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